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VIRGINIA LAW REVIEW

Published Monthly, During the Academic Year, by University of Virginia Law Students

Subscription Price, \$2.50 per Annum - - 35c per Number

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FOREWORD.—With this number the VIRGINIA LAW REVIEW begins its fifth volume. The policy of the previous Boards will be adopted by the present Board of Editors. Though handicapped this year by the small enrollment in the Law School, the increased cost of publication, due to the war, and the failure of the greater part of the Board of last year to return to the University, the present staff expects to maintain the standard of the past. In order to distribute the work required of the present staff and to secure greater coöperation with our Alumni and friends, we have for the present created the office of Alumnus Editor.

We wish to express our genuine gratitude to our contributors of leading articles, for it is to them that we owe whatever success the REVIEW may have attained. Our chief encouragement for the coming year is the generous promises of our contributors for future contributions.

THE LAW SCHOOL.—At the date of going to press the total enrollment in the Law School numbers 96 which represents a loss of 60 per cent. of the enrollment of last year. But heavy as this loss appears, a comparison with the enrollment of other law schools in the country shows that this is a normal loss. The following table indicates the enrollment by states and countries:

Arkansas	1	Missouri	1
Canada	1	North Carolina.....	1
Connecticut	1	Pennsylvania	3
Florida	1	Tennessee	5
Georgia	3	Texas	1
Illinois	1	Virginia	65
Kentucky	5	West Virginia	4
Maryland	1	Wyoming	1
Mexico	1		—
		Total	96

The loss of Professor Dobie, who left last May on an indefinite leave of absence to attend the Reserve Officers' Training Camp at Fort Myer and who is now a Captain of Infantry at Camp Lee, Petersburg, Virginia, is keenly felt by the Law School. Mr. Forrest Hyde, who was Graduate Instructor in the Law Department last year, has been made adjunct professor and will take charge of Professor Dobie's work until his return. Due to the small enrollment this year, the instructor system has been dispensed with for the present.

VALIDITY OF STATUTE LIMITING HOURS OF LABOR IN MILLS, FACTORIES, OR MANUFACTURING ESTABLISHMENTS.—In the recent case of *Bunting v. Oregon*, 37 Sup. Ct. 435, the second section of an Oregon statute,¹ providing that "no person shall be employed in any mill, factory, or manufacturing establishment in this state more than ten hours in any one day except watchmen and employees when engaged in making necessary repairs or in case of emergency where life or property is in imminent danger" with a proviso that "employees may work overtime not to exceed three hours in any one day, conditioned that payment be made for such overtime at the rate of time and one half of the regular wage" was upheld by a divided court as being consonant with the Fourteenth Amendment of the Federal Constitution, inasmuch as the law was a proper exercise of the police power of the State.

The right of a State, in the exercise of its general police power, to make such regulations as are necessary for the health and welfare of its citizens, is not denied, and has been affirmed by numerous decisions of both the federal and state courts, especially as regards the regulations of industries of an inherently hazardous or peculiarly unhealthy nature, or those wherein women and children are employed.² But in the decision referred to, it was con-

¹ Oregon Laws, 1913, chap. 102.

² *Richie v. People*, 155 Ill. 98, 40 N. E. 454, 46 Am. St. Rep. 315, 29 L. R. A. 79; *Cantwell v. State of Missouri*, 199 U. S. 602; *Holden v. Hardy*, 169 U. S. 366; *In re Morgan*, 26 Colo. 415, 58 Pac. 1071, 47 L. R. A. 52, 77 Am. St. Rep. 269; *Wenham v. State*, 65 Neb. 394, 91 N. W. 421, 58 L. R. A. 825; *Muller v. Oregon*, 208 U. S. 412.